

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

CITY OF GOODLETTSVILLE,	§	
Plaintiff,	§	
v.	§	CASE NO. _____
NORTH AMERICAN SPECIALTY	§	
INSURANCE COMPANY,	§	
Defendant.	§	

NOTICE OF AND PETITION FOR REMOVAL

Comes now the Defendant, North American Specialty Insurance Company ("NAS"), pursuant to 28 U.S.C. § 1446, and files this Notice of and Petition for Removal of the above-styled case originally filed by the Plaintiff in the Circuit Court for Davidson County, Tennessee. As grounds, NAS would state as follows.

1. On June 25, 2010, the Plaintiff filed a Complaint against NAS in the Circuit Court for Davidson County, Tennessee. NAS was served on June 30, 2010 via the Tennessee Department of Commerce and Insurance.

2. Attached hereto as **EXHIBIT A** is a copy of the Summons and Complaint, which constitutes all process, pleadings, orders, and other papers filed with the Davidson County Circuit Court that have been served on NAS.

3. As alleged in the Complaint, Plaintiff is the City of Goodlettsville, Tennessee, a municipal corporation duly chartered and authorized under the laws of the State of Tennessee with offices located at 105 South Main Street, Goodlettsville, Davidson County, Tennessee 37072.

4. NAS is a New Hampshire corporation with its principal place of business in Manchester, New Hampshire.

5. This is a civil action over which this Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1332(a), because the Plaintiff and NAS have complete diversity of citizenship and the amount in controversy exceeds \$75,000.

6. This Notice of Removal is being filed within thirty (30) days after NAS received notice of the Complaint and is thus timely filed under 28 U.S.C. § 1446(b).

7. A copy of this Notice of Removal will be filed with the Clerk of the Circuit Court for Davidson County, Tennessee, and served upon the Plaintiff's counsel in accordance with 28 U.S.C. § 1446(d).

WHEREFORE, NAS prays that the above action now pending in the Circuit Court for Davidson County, Tennessee be removed to this District Court, and for all other relief that this Court deems just and proper.

Respectfully submitted,

MANIER & HEROD,
A TENNESSEE PROFESSIONAL CORPORATION

/s/ Fred C. Statum III

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North American Specialty Insurance Company

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been furnished via first class U.S. Mail to the following on this 26th day of July, 2010.

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Attorneys for Plaintiff

/s/ Rebecca B. Howald

Rebecca B. Howald.